

**UNITED STATES DISTRICT COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

HOLY SPIRIT ASSOCIATION FOR THE
UNIFICATION OF WORLD
CHRISTIANITY,

Plaintiff,

-against-

WORLD PEACE AND UNIFICATION
SANCTUARY, INC.,

Defendant.

No.: _____

JURY TRIAL DEMANDED

COMPLAINT

Plaintiff, Holy Spirit Association for the Unification of World Christianity (“HSA-UWC” or “Plaintiff”), also known as Family Federation for World Peace and Unification and Family Federation for a Heavenly USA, by its attorneys, Davis Wright Tremaine LLP, the Law Offices of Jennifer A. Klear, and Eckert Seamans Cherin & Mellott, LLC, brings this action against World Peace and Unification Sanctuary, Inc. (“Sanctuary Church” or “Defendant”) and alleges, upon personal knowledge as to its own acts and status and upon information and belief as to all other matters, as follows:

NATURE OF THE ACTION

1. HSA-UWC brings this action against Sanctuary Church for infringing and diluting HSA-UWC's long-standing trademark, the Twelve Gates symbol (the "TWELVE GATES Mark" or the "Mark").

2. Sanctuary Church is a church which split off from HSA-UWC in 2014 and has espoused a gun-centered theology and political agenda repugnant to central tenets of HSA-UWC's theology, yet continues to use HSA-UWC's marks and goodwill, thereby infringing and diluting the marks and causing substantial injury to HSA-UWC.

3. HSA-UWC is the branch of the Unification Church in the United States. The Unification Church is a global religious organization with 1,200 chapters in 160 countries, founded by Reverend Sun Myung Moon ("Reverend Moon") and his wife, Mrs. Sun Myung Moon. Since its formation in 1961, HSA-UWC has expanded to 109 chapters with over 16,000 members in 50 states. The Church is currently led by Mrs. Moon.

4. HSA-UWC owns common law and statutory rights in the iconic TWELVE GATES Mark, pictured in Figure 1 below. The Mark has come to identify and be exclusively associated with the Church and its doctrine. HSA-UWC has used the Mark continuously for over 50 years as a logo, in connection with conducting

religious and spiritual services and spiritual retreats, and for other purposes. It registered the Mark with the United States Patent and Trademark Office, Serial No. 77,626,340, on June 30, 2009. A true and correct copy of Plaintiff's trademark registration is attached hereto as **Exhibit A**.



Figure 1

5. HSA-UWC has spent millions of dollars promoting the TWELVE GATES Mark and developing the public's exclusive association between the distinctive Mark and HSA-UWC.

6. In or about 2013, Hyung Jin Moon ("Sean Moon"), Reverend and Mrs. Moon's son and a former leader of the Unification Church, was replaced as president of HSA-UWC. At or around the same time, Sean Moon began to form Sanctuary Church, an entity which departs radically from HSA-UWC's doctrine and teachings in striking ways. Most notably, while the theological textbook of Unification Church, known as the *Divine Principle*, prophesies that the "rod of iron" as discussed in the Book of Revelation in the Christian Bible signifies the Word of God,

Sanctuary Church teaches that “rod of iron” is embodied by an AR-15 semiautomatic rifle or equivalent weapon. As a result, Sanctuary Church theology is gun-centered and a perversion of the beliefs of the Unification Church, and by extension HSA-UWC.

7. Upon information and belief, Sanctuary Church began using close approximations of the TWELVE GATES Mark in or about April 2015, in connection with religious services and events and political demonstrations, in newsletters, on its website, and in videos posted to its YouTube and Vimeo channels. It has continued to use the Mark to date in connection with all of these services and to promote Sanctuary Church.

8. The TWELVE GATES Mark as it is used by Defendant is virtually identical to Plaintiff’s TWELVE GATES Mark, with the exception that Defendant has changed the color from red to gold, and, in some instances, set the Mark against a background of guns and other weapons (these variations referred to collectively herein as “Defendant’s Marks”). Figure 2 below shows Defendant’s prominent use of Defendant’s Marks on signage and regalia during a religious ceremony on or about August 19, 2016. Figure 3, featuring Sean Moon wearing a crown of bullets, includes a shield which sets Plaintiff’s TWELVE GATES Mark against an array of

guns and other weapons, in a video posted on Defendant's Vimeo channel on or about February 23, 2018.



Figure 2



Figure 3

9. On February 28, 2018, Sanctuary Church held a marriage commitment ceremony which involved a blessing of guns, in which congregants were instructed to bring an AR-15 or equivalent semi-automatic rifle to the church ceremony (“Marriage Gun Commitment Ceremony”), as seen in Figure 4 below.



Figure 4

10. Particularly in light of the recent, tragic school shootings in Parkland, Florida and elsewhere, the Marriage Gun Commitment Ceremony drew nationwide media attention, and sparked intense controversy. The TWELVE GATES Mark was visible throughout the ceremony in a variety of places including, *inter alia*, on congregants’ clothing, flags, and banners, as seen in Figure 5 below and in the video capturing the event attached as **Exhibit B**.



Figure 5

11. Given Sanctuary Church’s theology, it comes as no surprise that Sean Moon and Sanctuary Church have been active in supporting gun rights. In or about August 2016, Sean Moon and Sanctuary Church hosted an address by Eric Trump, son of President Donald J. Trump, at the opening of Tommy Gun Warehouse in Greeley, Pennsylvania, which, upon information and belief, is owned by Sean Moon’s brother. Sanctuary Church’s association with that event was widely reported online.

12. On or about February 24, 2018, Sanctuary Church, also using the name “Rod of Iron Ministries,” held a “President Trump Thank You Dinner” in Matamoras, Pennsylvania. The main objective of the event, as stated by its press release, attached hereto as **Exhibit C**, was “to support a pro-gun agenda and to get a

clean concealed carry reciprocity bill (S. 446) on the President's desk." Defendants' Marks can be seen not only in the press release but in the backdrop visible behind speakers at the event itself, as shown in Figure 6 below.

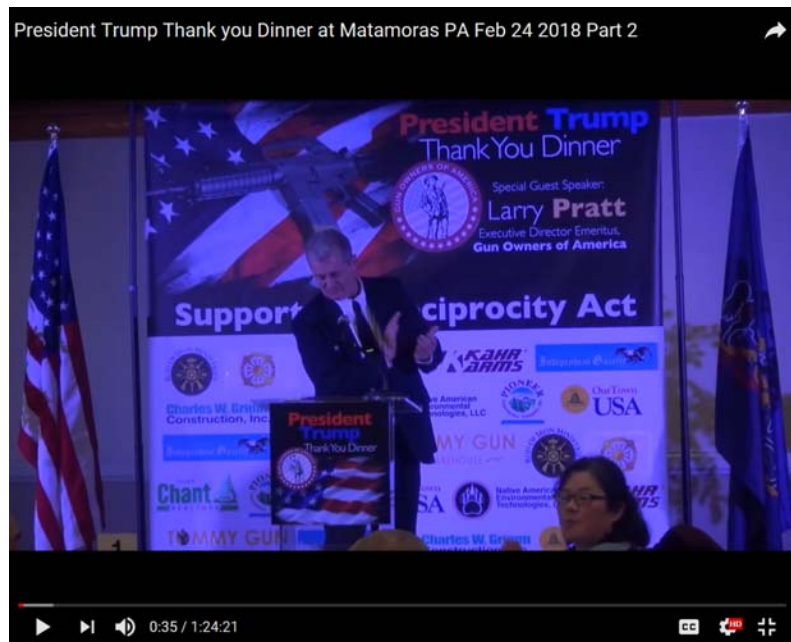


Figure 6

13. Defendant continues to be the subject of media fascination and curiosity. As recently as June 19, 2018, A&E, a major cable network, aired an hour-long exposé of Sanctuary Church's political and religious activities. In the documentary, the TWELVE GATES Mark is prominently featured no less than 64 times, often in connection with guns and gun paraphernalia, as seen in Figures 7-10 below.



Figure 7



Figure 8



Figure 9

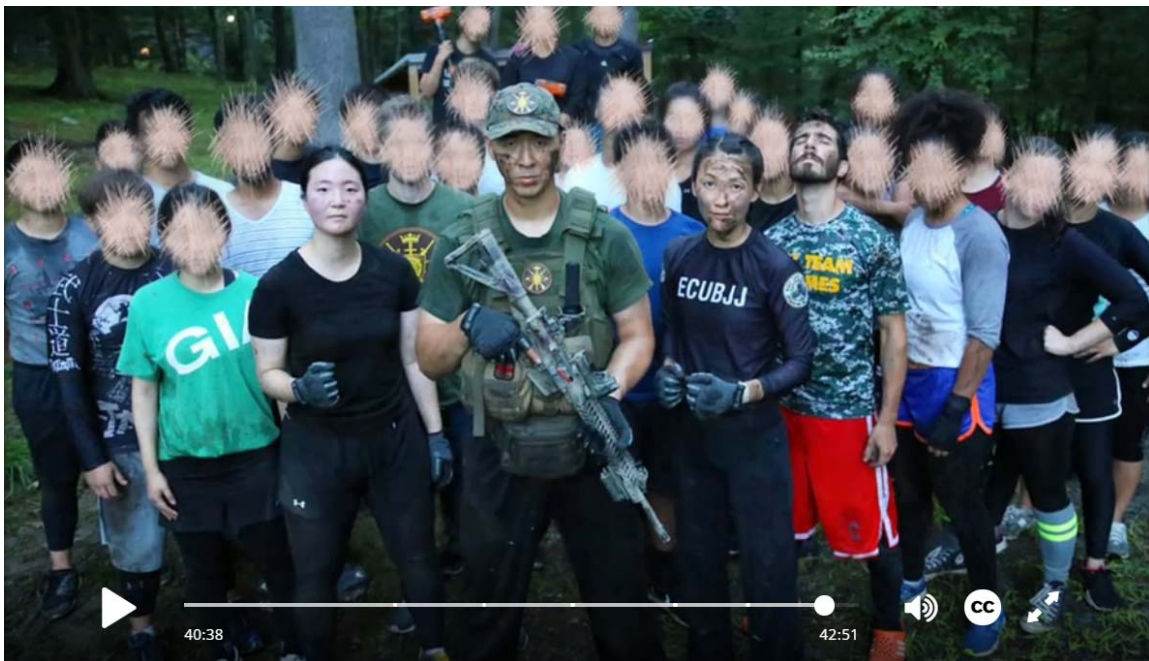


Figure 10

14. Sanctuary Church's use of the TWELVE GATES Mark has created a likelihood of confusion among the public as to the source of its services and thereby infringes the Mark. Sanctuary Church has further damaged Plaintiff by eroding the goodwill associated with HSA-UWC and the TWELVE GATES Mark, thereby diluting the Mark.

15. Plaintiff has repeatedly sought a non-litigated resolution, but Defendant has steadfastly refused to cease its infringement on Plaintiff's statutory and common law intellectual property rights. The prominent use of the TWELVE GATES Mark during the Ceremony and Defendant's expressly political exploitation of the Mark in other recent events have cumulatively pushed HSA-UWC past the breaking point, causing it irreparable harm. These recent events have drawn vast publicity which has greatly increased the actual and likely confusion engendered by Sanctuary Church's activities and cast Plaintiff's name and Mark into disrepute well beyond Sanctuary Church's prior activities.

16. In order to protect its valuable intellectual property, Plaintiff brings this action in law and in equity asserting claims for (i) trademark infringement, under the Lanham Act, 15 U.S.C. §1114 et seq., as amended (hereinafter the "Lanham Act"), (ii) trademark dilution under 15 U.S.C. §1125(c), (iii) false association under 15 U.S.C. § 1052(a); and (iv) unfair competition under the common law.

THE PARTIES

17. HSA-UWC is a not-for-profit corporation, organized and existing under the laws of the State of California, with a principal place of business at 4 West 43rd Street, New York, New York, 10036. HSA-UWC is the United States branch of the Unification Church, which was founded by Reverend Moon and Mrs. Hak Ja Han Moon in the early 1950s in Seoul, Korea.

18. Upon information and belief, Sanctuary Church is a corporation, organized and existing under the laws of the State of Delaware, with a place of business at 889 Main Street, Newfoundland, Wayne County, Pennsylvania 18445.

JURISDICTION AND VENUE

19. This Court has jurisdiction over the subject matter of this action pursuant to 15 U.S.C. §1121 and 28 U.S.C. §1331 and §1338 with respect to the claims arising under federal law, and supplemental jurisdiction pursuant to 28 U.S.C. §1367 with respect to the claims arising under Pennsylvania law.

20. This Court has personal jurisdiction over Sanctuary Church because Sanctuary Church is based in Newfoundland, Wayne County, Pennsylvania, where it regularly conducts its religious services and events for its members, operates a website and YouTube and Vimeo channels to attract new members and engage with the public, and has engaged and continues to engage in infringing and diluting

activity using Plaintiff's intellectual property in each of these activities. Sanctuary Church's actions have caused injury to Plaintiff and the public in Pennsylvania, among other places.

21. Venue is proper in the Middle District of Pennsylvania pursuant to 28 U.S.C. §§1391(b) and (c), and 28 U.S.C. §118(b) because Sanctuary Church resides in this judicial district and a substantial part of the events or omissions giving rise to the claim occurred in this judicial district.

FACTS COMMON TO ALL CLAIMS

Unification Church and HSA-UWC

22. Reverend Moon and Mrs. Hak Ja Han Moon are known as the True Parents. Their mission is to unite the world's religions, to restore values to science, the arts and media, to establish true God-centered marriages, and to proclaim the Second Advent of Christ in the "True Parents."

23. The Unification Church started a worldwide movement. It grew from a small church in Korea to a global religion, with members around the world, in a span of 40 years.

24. The Unification Church respects the spiritual disciplines of all the world's religions. Unification Church members engage in and encourage all traditional spiritual practices: prayer and meditation, developing a daily and weekly

spiritual rhythm, regular study of God's Word, active participation in the life of a spiritual community, service to others, receiving and giving mentoring, and the practice of sexual purity. Individuals sometimes choose to invest in more strenuous spiritual practices, such as fasting, vigils and so forth.

25. Unification Church members also practice and endorse conflict resolution through the practice of true love.

26. Unification Church members have taken stances against communism and racial discrimination. They also support a wide variety of political causes, political parties and political organizations. HSA-UWC itself does not endorse any one political party in the United States.

27. In 1965, Reverend Moon developed the TWELVE GATES Mark to serve as the distinctive trademark of HSA-UWC. He ensured that every aspect of the unique design of the TWELVE GATES Mark holds symbolic meaning to Unification Church members.

28. The TWELVE GATES Mark as a whole signifies the cosmos with God at the center. The shape of the Mark represents the steering wheel of a boat to symbolize steering the cosmos. Moreover, the twelve rays emanating from the center represent the twelve months of the year while the four wider lines represent the cardinal directions – east, west, south and north.

29. Over the years, HSA-UWC has displayed the TWELVE GATES Mark in a variety of colors, including red, silver, gold and blue.

30. HSA-UWC has continuously used the TWELVE GATES Mark since 1965 to identify its religious services, including its prayer services, spiritual retreats, marriage ceremonies and community outreach. In addition to featuring the TWELVE GATES Mark on its website, HSA-UWC has marketed and continues to market its religious services through several websites, on Facebook, Instagram, Vimeo, YouTube, signs, pamphlets, banners, flyers, newsletters, books, magazines, flags and the sale of dozens of religious mementos such as rings and boxes, bearing the TWELVE GATES Mark, in the United States.

31. As such, HSA-UWC has invested significant time, energy, and resources in the advertising, promotion, and outreach using materials which bore the TWELVE GATES Mark – of its religious services.

32. The TWELVE GATES Mark is the subject of a valid and subsisting United States trademark registration, Serial No. 77,626,340, attached hereto as **Exhibit A**, on the Principal Register of the United States Patent and Trademark Office, which was registered by Plaintiff on June 30, 2009.

33. HSA-UWC's marketing and promotional efforts have had a profound impact on its membership and renown. Since its formation in the 1960s, HSA-

UWC has expanded from a small group of several dozen members to 109 chapters with over 16,000 members in all 50 states. In fact, HSA-UWC's ceremonies and rallies have drawn such widespread attention that HSA-UWC ceremonies have filled Madison Square Garden, Yankee Stadium, the Washington Monument Mall, and many other venues. HSA-UWC continues to hold rallies, appearances and other events aimed to enhance the group's visibility in the United States and around the world. For instance: (i) Mrs. Hak Ja Han Moon has recently addressed a distinguished group of 300 leaders from 54 nations, including members of the United States Congress, civic, religious, policy and NGO leaders in Washington D.C.; (ii) HSA-UWC has opened the International Peace Education Center in Las Vegas, Nevada with thousands in attendance at the center's dedication; (iii) and Mrs. Hak Ja Han Moon has hosted 35 delegates from the World Africa Summit in Kona, Hawaii to discuss economic development in their countries.

34. By virtue of the extensive distribution and success of HSA-UWC's religious outreach, the TWELVE GATES Mark is recognized and relied upon by the public as distinguishing HSA-UWC's religious services from the goods and services of others. Further, the TWELVE GATES Mark has come to represent and symbolize the extremely valuable goodwill and widespread reputation belonging exclusively to HSA-UWC.

35. By virtue of the extensive distribution and success of the HSA-UWC's religious outreach, the TWELVE GATES Mark is distinctive and famous.

Formation of World Peace and Unification Sanctuary, Inc.

36. Before Sean Moon broke away from HSA-UWC, he was a prominent member. He served as President of HSA-UWC from September 16, 2012 to February 23, 2013; he was a member of the HSA-UWC Board from March 28, 2009 until his resignation on July 10, 2013; and he served as International President of Family Federation for World Peace and Unification International from May 20, 2008 until his suspension on February 26, 2015.

37. While still serving in a leadership capacity in HSA-UWC, Sean Moon began his efforts to create Sanctuary Church. On or about March 22, 2013, he incorporated Sanctuary Church in the State of Delaware. On or about September 9, 2014, Sean Moon formed Sanctuary Church, in Newfoundland, PA.

38. Ultimately, he was suspended from the Family Federation on February 26, 2015 for "abuse of authority and violation of church tenets." Thereafter he launched Sanctuary Church.

39. Sean Moon claims to be the heir to Reverend Moon's teachings and posits Sanctuary Church as the institution espousing the true teachings of Reverend Moon. HSA-UWC fervently disagrees with these claims.

40. Upon information and belief, in or about April 2015, Sanctuary Church began using Defendant's Marks, which are virtually identical versions of the TWELVE GATES Mark, in connection with its religious services and events, political demonstrations, in newsletters, on its website, and in videos posted to its YouTube and Vimeo channels, and continues to do so today.

41. Until recently, HSA-UWC had hoped to resolve this issue amicably with its prior President, Sean Moon. However, the nature of Sanctuary Church's use of the TWELVE GATES Mark has grown more egregious over the years.

42. For instance, in recent months, Sanctuary Church has used Defendant's Marks in connection with both political and religious events centered around semiautomatic rifles and other guns.

43. On or about February 24, 2018, Sanctuary Church held a "President Trump Thank You Dinner" in Matamoras, Pennsylvania, prominently featuring Defendant's Marks, "to support a pro-gun agenda and to get a clean concealed carry reciprocity bill (S. 446) on the President's desk." See Paragraph 12 and **Exhibit C**, *supra*.

44. On February 28, 2018, Sanctuary Church held the Marriage Gun Commitment Ceremony, in which congregants attending brought a gun to the ceremony. They were instructed to bring an AR-15 semiautomatic rifle, or a similar

weapon. Defendant's Marks were, again, highly visible at this event, including, *inter alia*, on congregants' clothing, flags, and banners.

45. The Marriage Gun Commitment Ceremony received nationwide media attention, including coverage in *The Washington Post*, *USA Today*, *Huffington Post*, *Vox*, *Newsweek*, *Esquire*, *NBC News*, and *CNN*, in light of recent mass school shootings – most notably the tragic mass shooting that occurred in Parkland, Florida on February 14, 2018. In many instances, the news coverage did little, if nothing, to differentiate the activities or beliefs of Sanctuary Church from that of Unification Church or HSA-UWC.

46. Defendant's use of Defendant's Marks in connection with the Marriage Gun Commitment Ceremony caused "actual confusion" between Sanctuary Church and Plaintiff. In one instance, Reuters.com, an online news source, initially wrongly reported that HSA-UWC was associated with the Marriage Gun Commitment Ceremony. Reuters later had to correct its article. In another example, a fake twitter account for the Unification Church was created that displayed the iconography of Jesus Christ on a cross adorned with pistols.

47. HSA-UWC's ministry does not promote gun violence and does not lobby for gun rights or incorporate guns in its religious ceremonies. Given the controversial nature of Sanctuary Church's gun commitment ceremonies and the

politically-contentious nature of gun rights, and to clarify instances of actual confusion between Sanctuary Church and HSA-UWC (and Family Federation), Plaintiff was compelled to release a press statement in connection with the Marriage Gun Commitment Ceremony stating “We would also like to take this opportunity to stress that our events, programs and theology do not involve the use of firearms or weapons whatsoever.... A breakaway organization calling themselves The World Peace and Unification Sanctuary of Newfoundland, PA, known simply as Sanctuary Church, is not affiliated with Family Federation.”

48. Even before these gun-centered events, HSA-UWC notified Sanctuary Church of its violations of HSA-UWC’s trademark rights. On May 3, 2016, HSA-UWC sent a cease and desist letter to Sanctuary Church, putting it on notice of, among other things, its infringing use of the TWELVE GATES Mark. Counsel for Sanctuary Church responded on May 31, 2016, defending its infringing use on the ground, *inter alia*, that Sean Moon is the true heir of HSA-UWC and thus the owner of the TWELVE GATES Mark. HSA-UWC fervently denied this claim in its letter in response, dated September 22, 2016, and Sanctuary Church’s counsel failed to offer any further defense of it.

49. The prominent use of Defendant’s Marks during the Marriage Gun Commitment Ceremony and Defendant’s expressly political exploitation of its Marks

at gun rights events have, cumulatively, brought this matter to a head, raising Defendant's conduct from "mere" infringement and dilution to a level that is causing irreparable injury to HSA-UWC and threatens to continue to do so. Sanctuary Church's ongoing use of the Mark in connection with its services has led to actual and likely confusion and the dilution of the Mark.

50. Plaintiff has no adequate remedy at law and, if Defendant's activities are not enjoined, Plaintiff will continue to suffer irreparable harm and injury to its goodwill and reputation.

FIRST CAUSE OF ACTION

Federal Trademark Infringement and Federal Unfair Competition Under the Lanham Act, 15 U.S.C. §1114 et seq.

51. Plaintiff repeats and incorporates by reference the allegations contained in the foregoing paragraphs of this Complaint.

52. Plaintiff possesses valid and enforceable rights in the TWELVE GATES Mark in connection with all of the goods and services at issue in this case by virtue of their extensive use, registration, promotion, and advertisement of the TWELVE GATES Mark, and has possessed such rights at all times material hereto.

53. Defendant's Marks create the same or similar commercial impression as the TWELVE GATES Mark as evidenced by, among other things, their similar appearance to the TWELVE GATES Mark and Defendant's use of Defendant's

Marks in connection with religious services which are competitive with Plaintiff's religious services.

54. Sanctuary Church's conduct is willful, deliberate, in bad faith, and undertaken with knowledge of Plaintiff's prior rights, and with full knowledge that Sanctuary Church has no right, license, or authority to use Plaintiff's Mark or any confusingly similar variant thereof.

55. Defendant's unauthorized use of Plaintiff's Mark is likely to cause confusion, or to cause mistake, or to deceive as to sponsorship, affiliation, connection, or association of Defendant or Defendant's commercial activities with Plaintiff or Plaintiff's commercial activities, or as to the origin, sponsorship, or approval of Defendant's services or commercial activities by Plaintiff.

56. Defendant's aforementioned acts constitute willful violation of Plaintiff's TWELVE GATES Mark in violation of the Lanham Act, 15 U.S.C. §1114.

57. By such wrongful acts, Defendant has caused, and unless restrained by the Court under 15 U.S.C. §1116 will continue to cause, serious irreparable injury and damage to Plaintiff and to the goodwill associated with Plaintiff's Mark.

58. This harm constitutes an injury for which Plaintiff has no adequate remedy at law.

SECOND CAUSE OF ACTION

Federal Trademark Dilution under the Lanham Act, 15 U.S.C. §1125(c)

59. Plaintiff repeats and incorporates by reference the allegations contained in the foregoing paragraphs of this Complaint. Through Plaintiff's extensive advertisement and promotion of its religious services and outreach, the TWELVE GATES Mark has become famous in the United States and throughout the world.

60. Sanctuary Church commenced the activities complained of herein after the TWELVE GATES Mark had become famous.

61. Relevant consumers are likely to make an association between Defendant's Marks and the TWELVE GATES Mark.

62. Defendant's Marks are likely to impair the distinctiveness of Plaintiff's TWELVE GATES Mark.

63. Moreover, Defendant's Marks are likely to blur and/or tarnish the positive associations with Plaintiff's TWELVE GATES Mark.

64. Thus, Defendant's aforementioned acts constitute trademark dilution in violations of the Lanham Act, Section 43(c), 15 U.S.C. §1125(c).

65. By such wrongful acts, Defendant has caused, and unless restrained by the Court, will continue to cause, serious irreparable injury and damage to Plaintiff and to the goodwill associated with Plaintiff's Mark.

66. Plaintiff is without an adequate remedy at law.

THIRD CAUSE OF ACTION

Common Law Unfair Competition

67. Plaintiff repeats and incorporates by reference the allegations contained in the foregoing paragraphs of this Complaint.

68. Defendant's aforementioned act constitutes unfair competition under the common law.

69. Plaintiff is without an adequate remedy at law.

FOURTH CAUSE OF ACTION

False Suggestion of Connection, under the Lanham Act, 15 U.S.C. § 1052(a)

70. Plaintiff repeats and incorporates by reference the allegations contained in the foregoing paragraphs of this Complaint.

71. The TWELVE GATES Mark is famous in the United States and throughout the world.

72. Defendant's Marks create the same or similar commercial impression as, or is a close approximation of, the TWELVE GATES Mark and falsely suggests a connection with HSA-UWC.

73. HSA-UWC is not connected with Sanctuary Church.

74. Due to the fame of Plaintiff and the TWELVE GATES Mark, when Defendant's Marks are used in commerce, a connection with Plaintiff is presumed by the consuming public.

75. Thus, Defendant's use of Defendant's Marks are likely to create a false sense of connection to Plaintiff in violation of Section 2(a) of the Lanham Act, 15 U.S.C. §1052(a).

76. Sanctuary Church's conduct has caused and is causing irreparable injury to Plaintiff and, unless enjoined by the Court, will continue both to damage Plaintiff and to deceive the public.

77. This harm constitutes an injury for which Plaintiff has no adequate remedy at law.

PRAYER FOR RELIEF

WHEREFORE, Plaintiff respectfully requests that this Court enter judgment as follows:

1. Enter judgment in favor of Plaintiff on all counts;
2. Preliminarily and permanently enjoining Defendant, its officers, directors, employees, agents, affiliates, successors, assigns, franchisees, licensees, and all those acting in concert with it, at its direction or pursuant to its control from:

a. Using, diluting, displaying, advertising, copying, imitating, or infringing upon the TWELVE GATES Mark, including by using Defendant's Marks or any variation thereof that is likely to be confusingly similar to, or dilutive of, the TWELVE GATES Mark;

b. Inducing, encouraging, causing, facilitating, materially contributing to, or receiving a direct financial benefit from, the use, reproduction, posting, and display of any trademark, including but not limited to the TWELVE GATES Mark and Defendant's Marks that are likely to be confusingly similar to, or dilutive of Plaintiff's TWELVE GATES Mark, by others in the United States;

c. Representing, by any means whatsoever, that any services offered, advertised, promoted, marketed, or sold by Defendant are offered by Plaintiff; or

d. Doing any other act or thing calculated or likely to cause confusion or mistake or dilute in the minds of the public or prospective consumers of Plaintiff's services as to the source of Defendant's services.

3. Awarding damages to Plaintiff in an amount to be ascertained at time of trial, including punitive damages for Defendant's gross, wanton, willful and morally culpable conduct;

4. Awarding Plaintiff its reasonable attorneys' fees pursuant to 15 U.S.C. §1117(a); and

5. Granting Plaintiff such other and further relief as to this Court shall deem just and proper.

Dated: July 30, 2018

Respectfully submitted,

ECKERT SEAMANS CHERIN & MELLOTT, LLC

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